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17 *Attorneys for Plaintiff*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

23 KRISTINA KERLUS, an individual;  
24 vs.  
25 Plaintiff,  
26 DR. JENNIFER CORNEAL, in her individual  
27 capacity; A. SANTOS, in her individual capacity;  
28 CITY OF LAS VEGAS, a municipal corporation;  
COUNTY OF CLARK, a municipal corporation; LAS  
VEGAS METROPOLITAN POLICE  
DEPARTMENT; jointly and severally,  
Defendants.

Case No. 2:24-cv-02352

**STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER PURSUANT TO FED.  
R. CIV. P. 26(f)(3) AND LR 26-1**

[Special Scheduling Review Requested]

23 Plaintiff Kristina Kerlus (“Plaintiff”), Defendant Dr. Jennifer Corneal, Defendant A.  
24 Santos, Defendant City of Las Vegas, Defendant County of Clark, and Defendant Las Vegas  
25 Metropolitan Police Department (“LVMPD,” collectively “Defendants” and with Plaintiffs, the  
26

1 "Parties") submit this Stipulated Discovery Plan and Scheduling Order pursuant to Fed. R. Civ.  
2 P. 26(f) and LR 26-1(b).

3 **I. INFORMATION PURSUANT TO FED. R. CIV. P. 26(f)**

- 4 **1. Rule 26(f) conference:** Counsel for the parties participated in a Fed. R. Civ. P. 26(f)  
5 conference on July 17, 2025. Paul S. Padda participated on behalf of Plaintiff, Lyssa  
6 Anderson, Esq. of Kaempfer Crowell participated on behalf of Defendants Angie  
7 Santos and Las Vegas Metropolitan Police Department, and Robert W. Freeman, Esq.,  
8 of Lewis Brisbois Bisgaard & Smith LLP participated on behalf of Defendants Dr.  
9 Jennifer Corneal and County of Clark.
- 10 **2. The Parties will exchange their respective Initial Disclosures on or before **July 31, 2025**,**  
11 fourteen (14) days after the Rule 26(f) Conference. The Parties do not anticipate  
12 any changes to the timing, form, or requirement for such disclosures.
- 13 **3. Subjects on which discovery may be needed:** Unless otherwise limited by  
14 subsequent stipulations or orders, the Parties shall be allowed to conduct discovery  
15 within the scope of FRCP 26(a).
- 16 **4. Issues regarding disclosure or discovery of electronically stored information,  
17 including the form or forms in which it is produced:** No issues at this time. If any  
18 issues arise later, the Parties will meet and confer before involving the Court. The  
19 Parties have also undertaken efforts to retain any electronically stored information  
20 relevant to this matter and have agreed that, unless the requesting party asks for a  
21 definite and specific form, the party producing any electronically stored information  
22 need not provide such information in any certain form as long as the form provides  
23 the other party reasonable access to the information.
- 24 **5. Issues about claims of privilege or protection of trial preparation materials:** No  
25 issues at this time. If any issues arise later, the Parties will meet and confer before  
26 involving the Court.
- 27 **6. Limitations on discovery:** None.
- 28

**7. Other orders under Rule 26(c) or Rule 16(b) and (c):** None as of this date.

**II. INFORMATION PURSUANT TO LOCAL RULE 26-1(b) AND LOCAL RULE 26-**

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1. **Alternative dispute resolution:** The parties certify they have met and conferred about the possibility of using alternative dispute resolution processes. The parties have not agreed to use these processes currently but remain open to considering them after further progress in discovery.

**2. Alternative forms of case disposition:** The parties certify that they discussed and considered consenting to trial by a magistrate judge under 28 U.S.C. § 636(c) and FRCP 73 and the use of the Short Trial Program (General Order 2013-01). The parties do not consent to these options currently.

**3. Electronic evidence.** The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purpose of jury deliberations. The parties intend to meet and confer regarding electronic evidence should any disputes arise.

**4. Extensions of discovery deadlines:** Pursuant to LR 26-3, a motion or stipulation to any date set by the discovery plan, scheduling order, or other order, must in addition to meeting the requirements of LR IA 6-1, be supported by a showing of good cause for the motion; be received by the court no later than twenty-one (21) days before the expiration of the subject deadline; and any request within twenty-one (21) days of the subject deadline must be supported by a showing of good cause. Any request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect. The motion or stipulation to extend a discovery deadline or to reopen discovery must include:

(a) A statement specifying the discovery completed;

- 1 (b) A specific description of the discovery that remains to be completed;
- 2 (c) The reasons by the deadline was not satisfied or the remaining discovery
- 3 was not completed within the time limits set by the discovery plan; and
- 4 (d) A proposed schedule for completing all remaining discovery.

### 6 III. DISCOVERY PLAN UNDER LOCAL RULE 26-1(b) AND LOCAL RULE 26-3

7 The Parties propose the following deadlines:

8 **1. Initial disclosures:** July 31, 2025

9 **2. Discovery cut-off:** May 27, 2026, which is three-hundred and sixty-five (365) days  
10 from May 27, 2025; the date of the first appearance in this matter. The parties believe  
11 that this will be sufficient time to conduct discovery given the number of potential  
12 witnesses with knowledge of this matter. Indeed, Plaintiff's claims relate to her arrest  
13 related to the death of her child and the subsequent criminal proceedings that spanned  
14 a time-period of almost three (3) years. The parties suggest that discovery matters  
15 will require additional time and the typical 180 days calculated from the date of the  
16 first appearance in this matter is not sufficient. As such, special scheduling review is  
17 requested.

18 **3. Amend pleadings or add parties:** February 26, 2026, which is ninety (90) days prior  
19 to the close of discovery.

20 **4. Expert disclosures:** March 30, 2026, which is sixty (60) days prior to the close of  
21 discovery.

22 **5. Expert rebuttal disclosures:** April 29, 2026, which is thirty (30) days after the  
23 deadline to disclose expert disclosures.

24 **6. Dispositive motions:** June 26, 2026, which is thirty (30) days after the close of  
25 discovery.

1           **7. Pretrial order:** July 27, 2026. In the event dispositive motions are filed, the deadline  
2           for filing the joint pretrial order shall be suspended until 30 days after decision on the  
3           dispositive motions or further court order.

4           **8. Pretrial disclosures:** The disclosures required by FRCP 26(a)(3) and any objection  
5           thereto shall be included in the Pretrial Order.

6           DATED this 23rd day of July 2025  
7           PAUL PADDA LAW, PLLC  
8           ROMANUCCI & BLADIN, LLC

DATED this 23rd day of July 2025  
LEWIS BRISBOIS BISGAAD &  
SMITH, LLP  
KAEMPFER CROWELL

9           By: /s/ Patrick J. Driscoll  
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22          *Kristina Kerlus*

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*Attorneys for Defendant*  
*Angie Santos*

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2                   **ORDER**  
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4                   IT IS SO ORDERED.  
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6                   Dated this \_\_\_\_ day of July, 2025.  
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8                   UNITED STATES MAGISTRATE JUDGE  
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